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[Proposed] Lead Counsel for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KALMAN ISAACS, Individually and on)	Case No. 3:18-cv-04865-EMC
Behalf of All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	DECLARATION OF TRICIA L.
vs.)	MCCORMICK IN SUPPORT OF DANY
)	DAVID'S MOTION FOR
ELON MUSK, et al.,)	CONSOLIDATION OF RELATED
)	ACTIONS, APPOINTMENT AS LEAD
Defendants.)	PLAINTIFF, AND APPROVAL OF
)	SELECTION OF COUNSEL

DATE: November 15, 2018
TIME: 1:30 p.m.
CTRM: 5
JUDGE: Hon. Edward M. Chen

1 I, TRICIA L. MCCORMICK, declare as follows:

2 1. I am an attorney licensed to practice before all of the courts of the State of California
3 and this Court. I am Special Counsel with Robbins Geller Rudman & Dowd LLP, proposed lead
4 counsel for Dany David ("Mr. David") in the above-captioned action. I make this declaration in
5 support of Mr. David's Motion for Consolidation of Related Actions, Appointment as Lead Plaintiff,
6 and Approval of Selection of Counsel. I have personal knowledge of the matters stated herein and, if
7 called upon, I could and would competently testify thereto.

8 2. Attached are true and correct copies of the following exhibits:

9 Exhibit A: Notice of pendency of class action published on *PR Newswire*, a national
10 business-oriented wire service, on August 10, 2018;

11 Exhibit B: Mr. David's Sworn Certification;

12 Exhibit C: Mr. David's estimated losses;

13 Exhibit D: Robbins Geller Rudman & Dowd LLP firm résumé; and

14 Exhibit E: Loeff, Cabraser, Heimann & Bernstein, LLP firm résumé.

15 I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th
16 day of October, 2018.

17
18 s/ Tricia L. McCormick
TRICIA L. MCCORMICK

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2018, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 9, 2018.

s/ TRICIA L. McCORMICK
TRICIA L. McCORMICK

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Mailing Information for a Case 3:18-cv-04865-EMC Isaacs v. Musk et al

Electronic Mail Notice List

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Manual Notice List

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- (No manual recipients)